



**Mid – Atlantic Regional Council**  
*Dedicated to Enhancing the Utilization of Small Business*

# Decoding SB Subcontracting

Major Issues/Topics  
in Small Business Subcontracting and Reporting  
SBA–SBLO Forum Discussion

9 November 2011– Annapolis, MD



# Small Business Size Standards and Certifications

- ▶ **Size self–certification form**
  - Can I rely on CCR records in lieu of the form?
  - How often shall I obtain the form?
  - When do I need Reps & Certs?
- ▶ **Redesignated HUBZone maps**
  - Can I still count the subk dollars spent with a decertified HUBZone sub?
  - When will SBA complete updating DSBS?
- ▶ **Mergers and acquisitions/Growing out of the size limit**
  - What happens when my sub grows out of the size limit?
  - My sub was acquired by an OTSB and become a large business.
  - My sub is LB in some NAICS and SB in others—how to I document their size given that it may vary?



# Sourcing

- ▶ **Limited sourcing resources**
  - SBA has not been able to assist us in identifying small business subs.
  - CCR and DSBS: Helpful but not always – How can I determine from CCR/DSBS records whether a sub has capacity to perform?
- ▶ **Effective sourcing strategies**
  - How do you identify qualified small businesses for remote projects?
  - Have you had any success in locating qualified HUBZone firms?
  - What's been the general experience with SUBNet?



# eSRS Reporting

- ▶ **Multiple award task order contracts:**
  - Primes are required to combine all task orders in an ISR for multiple award task order contracts.
- ▶ **Explanations for your goal under achievements/shortfalls**
  - What does a CO and What does a CO/Deputy for Small Business Programs want to see in the Remarks block – dissertation or summary?
- ▶ **Exclusions from subk award data**
- ▶ **ISR reporting requirement**
  - Is an ISR required although no subk has been done?
  - What if only OCONUS subcontracting was done?
- ▶ **Indirect costs**
  - Am I required to include indirect costs in all reports?
  - What are the indirect costs that need to be excluded from my reports?
- ▶ **Who sees these reports?**
  - Who can reject/accept reports?
    - No consistency in accepting/rejecting a report
  - How are changes in roles/responsibilities at agency communicated to the Prime; specifically, who should be on the distribution for ISRs/SSRs?
  - Is there a time frame in which the reports must be accepted/rejected?



# Subcontracting Goals

- ▶ **Determining unrealistic goals:**
  - What are my options when an agency establishes unrealistic goals?
  - FAR 52.219–9 (c) states that the subcontracting plan shall be negotiated within the time specified by the CO, but this rarely happens; rather, the plan is required to be submitted with the proposal and must meet the prescribed goals in the solicitation.
- ▶ **Goal modifications:**
  - How shall I work with an agency to modify the goals?
  - What if the agency refuses to renegotiate/modify goals when presented with reasonable justification to do so?
- ▶ **Roadblocks to goal attainment:**
  - How do I challenge a CO requesting more self performance by the Prime, when I am proposing to self perform less in an attempt to afford more opportunities for SB subcontracting.
  - Using LB Team Subs vs. SB subcontracting when SB goal shortfalls are noted—CO prefers use of team subs but will not give consideration in evaluating SB plan achievements.



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# Where do I go for Help?

## Get to know your SBA CMR/PCR as well as your Agency's SB Deputy